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5 Attorney for Defendants
GREEN FARMS OF NEVADA, INC.,
6 dba WORLDWIDE PRODUCE

7
8 UNITED STATES DISTRICT COURT
9 DISTRICT OF NEVADA
10

11 MICHELLE IOVINO,

12 Plaintiff,

13 vs.

14 GREEN FARMS OF NEVADA, INC., a
Nevada corporation, dba WORLDWIDE
15 PRODUCE,

16 Defendants.
17

Case No. 2:19-cv-174

**[PROPOSED] STIPULATION AND
ORDER TO EXTEND TIME FOR
DEFENDANT TO FILE RESPONSIVE
PLEADING**

[FIRST REQUEST]

18 Plaintiff MICHELLE IOVINO and Defendants GREEN FARMS OF NEVADA, INC. dba
19 WORLDWIDE PRODUCE by and through their undersigned counsel, hereby agree and stipulate to
20 extend the time for Defendant to file a responsive pleading from the current deadline of March 6, 2019
21 up to and including **March 20, 2019**.

22 Such extension is necessary in light of the fact that Defendants' counsel was only recently
23 retained. The additional time will allow Defense counsel to continue to analyze the Complaint and
24 prepare a sufficient responsive pleading.

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1 This is the first request for an extension of time to respond to the Complaint. This request is
2 made in good faith and not for the purpose of delay.

3 Dated: February 25, 2019

Dated: February 25, 2019

4 Respectfully submitted,

Respectfully submitted,

5
6 /s/ Robert P. Spretnak, Esq.

7 ROBERT P. SPRETNAK, ESQ.
8 LAW OFFICES OF ROBERT P.
9 SPRETNAK

10 Attorney for Plaintiff
11 MARDEL P. CALLOWAY

/s/ Hilary B. Muckleroy, Esq.

HILARY B. MUCKLEROY, ESQ.
LITTLER MENDELSON, P.C.

Attorneys for Defendants
GREEN FARMS OF NEVADA, INC., dba
WORLDWIDE PRODUCE

12 **ORDER**

13 **IT IS SO ORDERED.**

14 Dated: February 26
15 _____, 2019.

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17 _____
18 UNITED STATES MAGISTRATE JUDGE